### IN THE DISTRICT COURT OF THE VIRGIN ISLANDS DIVISION OF ST. CROIX

PETRO INDUSTRIAL SOLUTIONS, LLC (PETRO),

Plaintiff,

VS.

ISLAND PROJECT AND OPERATING SERVICES, LLC (IPOS), VITOL US HOLDING II, CO., VITOL VIRGIN ISLANDS CORPS, (VVIC), ANDREW CANNING and OPTIS EUROPE, LTD., (OPTIS),

Defendants.

CASE NO. 1:21-CV-00312

**BREACH OF CONTRACT** 

JURY TRIAL DEMANDED

## NOTICE OF SERVICE OF PLAINTIFF PETRO INDUSTRIAL SOLUTIONS, LLC'S FIRST SET OF INTERROGATORIES TO DEFENDANT OPTIS EUROPE LIMITED

**PLEASE TAKE NOTICE** that Plaintiff has propounded its First Set of Interrogatories to Defendant **OPTIS EUROPE LIMITED**, through its respective counsel of record, and that said Documents were served upon the Defendant in the original.

RESPECTFULLY SUBMITTED LEE J. ROHN AND ASSOCIATES, LLC Attorneys for Plaintiff

DATED: January 25, 2023 BY: <u>/s/ Lee J. Rohn</u>

Lee J. Rohn, Esq. VI Bar No. 52 1108 King Street, Suite 3 (mailing) 56 King Street, Third Floor (physical) Christiansted, St. Croix U.S. Virgin Islands 00820

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**EXHIBIT** 

PETRO INDUSTRIAL SOLUTIONS, LLC V. IPOS, ET. AL., CASE NO. 1:21-CV-00312 NOTICE OF SERVICE OF PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT OPTIS EUROPE LIMITED

#### **CERTIFICATE OF SERVICE**

THIS IS TO CERTIFY that on January 25, 2023, I electronically filed the foregoing with the Clerk of the Court using the electronic filing system, which will send a notification of such filing to the following:

Alex Kaplan, Esq. Susman Godfrey 1000 Louisiana St., Suite 5100 Houston, TX 77002

Email Address: akaplan@susmangodfrey.com

Attorney For: Vitol Virgin Islands Corp. and VITOL US Holding II Co.

Andrew C. Simpson, Esq. Andrew C. Simpson, P.C. 2191 Church Street, Suite 5 Christiansted, VI 00820

Email Address: asimpson@coralbrief.com

Attorney For: Andrew Canning, OPTIS Europe Limited

Carl A. Beckstedt, III, Esq. Beckstedt & Kuczynski LLP 2162 Church Street Christiansted, USVI 00820

Email Address: carl@beckstedtlaw.com; tarsha@beckstedtlaw.com; gpark@susmangodfrey.com; akaplan@susmangodfrey.com

Attorney For: Vitol Virgin Islands Corp. and VITOL US Holding II Co.

Simone Francis, Esquire Ogletree, Deakins, Nash, Smoak & Stewart, LLC The Tunick Building, Suite 201 1336 Beltjen Road St. Thomas, VI 00802 Email Address: simone.francis@ogletreedeakins.com

Attorney For: Island Project and Operating Services, LLC

Y. Gloria Park Susman Godfrey LLP 1301 Avenue of the Americas, 32nd Floor New York, NY 10019 Email Address: GPark@susmangodfrey.com

Attorney For: Vitol Virgin Islands Corp. and VITOL US Holding II Co.

BY: <u>/s/ Lee J. Rohn</u> (slc)

### IN THE DISTRICT COURT OF THE VIRGIN ISLANDS DIVISION OF ST. CROIX

PETRO INDUSTRIAL SOLUTIONS, LLC (PETRO),

Plaintiff,

٧.

ISLAND PROJECT AND OPERATING SERVICES, LLC (IPOS), VITOL US HOLDING II, CO., VITOL VIRGIN ISLANDS CORPS, (VVIC), ANDREW CANNING and OPTIS EUROPE, LTD., (OPTIS),

Defendants.

CASE NO. 1:21-CV-00312

**BREACH OF CONTRACT** 

JURY TRIAL DEMANDED

# NOTICE OF SERVICE OF PLAINTIFF PETRO INDUSTRIAL SOLUTIONS, LLC'S FIRST DEMAND FOR PRODUCTION OF DOCUMENTS TO DEFENDANT OPTIS EUROPE LIMITED

PLEASE TAKE NOTICE that Plaintiff PETRO INDUSTRIAL SOLUTIONS, LLC has propounded its First Demand for Production of Documents to Defendant OPTIS EUROPE LIMITED through its respective counsel of record, and that said documents were served upon the Defendant in the original.

RESPECTFULLY SUBMITTED LEE J. ROHN AND ASSOCIATES, LLC Attorneys for Plaintiff

DATED: January 25, 2023 BY: /s/ Lee J. Rohn

Lee J. Rohn, Esq. VI Bar No. 52 1108 King Street, Suite 3 (mailing) 56 King Street, Third Floor (physical) Christiansted, St. Croix U.S. Virgin Islands 00820

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LEE J. ROHN AND ASSOCIATES, LLC 1108 King St, Ste 3 Christiansted, VI 00820 Tel: 340.778.8855 Fax: 340.773.2954 lee@rohnlaw.com PETRO INDUSTRIAL SOLUTIONS, LLC V. IPOS, ET. AL., CASE NO. 1:21-CV-00312

NOTICE OF SERVICE OF PLAINTIFF'S FIRST DEMAND FOR PRODUCTION OF DOCUMENTS TO DEFENDANT
OPTIS EUROPE LIMITED
Page 2

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